

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

T.D., A.G., J.G., and K.W., *individually,  
and on behalf of all others similarly  
situated,*

Plaintiffs,

v.

PIEDMONT HEALTHCARE, INC.,

Defendant.

No. 1:23-cv-05416 (TWT)

*Class Action Complaint*

**PIEDMONT HEALTHCARE, INC.'S  
MOTION TO DISMISS FIRST AMENDED CLASS ACTION COMPLAINT**

Defendant Piedmont Healthcare, Inc. files this Motion to Dismiss (Motion) pursuant to Federal Rule of Civil Procedure 12(b)(6).

As grounds for this Motion, Defendant shows that no construction of the factual allegations in Plaintiffs' First Amended Complaint will support any cause of action. In support of this Motion, Defendant relies upon its Memorandum of Law, which is filed contemporaneously herewith.

WHEREFORE, Defendant respectfully requests that this Court dismiss Plaintiffs' claims in their entirety with prejudice.

Date: February 2, 2024

Respectfully submitted,

**SHOOK, HARDY & BACON L.L.P.**

By: /s/ Joshua L. Becker

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**CERTIFICATE OF SERVICE AND  
LOCAL RULE 7.1(D) CERTIFICATION**

I hereby certify that on February 2, 2024, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing and effectuate service to all counsel of record in this matter, pursuant to Local Rule 5.1.

I further certify that this motion has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C).

/s/ Joshua L. Becker

Joshua L. Becker  
GA Bar #046046

*Counsel for Defendant  
Piedmont Healthcare, Inc.*